



SOUTHWEST ENERGY EFFICIENCY

Saving Money and Protecting the Environment Through More Efficient Energy Use



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July 2, 2015

Susan Bitter Smith, Chairman
Bob Stump, Commissioner
Bob Burns, Commissioner
Doug Little, Commissioner
Tom Forese, Commissioner

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Arizona Corporation Commission
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JUL 02 2015

Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2996

DOCKETED BY	MLB
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Re: E-00000V-15-0094, In the Matter of Resource Planning and Procurement in 2015 and 2016

Dear Chairman Bitter Smith and Commissioners:

The Southwest Energy Efficiency Project (SWEEP) appreciates the opportunity to provide these comments in response to the letters filed by Commissioner Doug Little and Commissioner Bob Burns on the future of the Integrated Resource Planning (IRP) process.

SWEEP supports a limited extension of the filing deadline for the 2016 IRPs for many of the reasons described by Commissioner Little. However, SWEEP has concerns that too long of an extension could have drawbacks. Indeed a timely IRP is important because:

- It will support the Commission's efforts to pursue, implement, and assess improvements to the IRP process.
- It will provide valuable information that the Commission, the Arizona Department of Environmental Quality, and stakeholders can consider as they evaluate possible Clean Power Plan compliance scenarios.
- The Commission and Arizona's utilities need to continue to plan for the state's future regardless of a federal rule. Continued planning is particularly important in light of emerging technologies and changes to the utility business model.

We agree with Commissioner Little that it would be helpful to the IRP process to know what is in the final Clean Power Plan, and to have time in the IRP process to consider the potential impacts of the Clean Power Plan. The reverse is also true: In whatever manner Arizona decides to respond to the final Clean Power Plan, it will be valuable to have up-to-date information about Arizona's energy loads, resources, and emissions – and potential scenarios for the future – to



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inform Arizona's Clean Power Plan decision-making. Notably, this useful information is developed through the IRP process along the way. Too late of a filing deadline for the IRPs could mean that this useful information may not be available to fully inform Clean Power Plan discussions and analyses.

To that end, SWEEP suggests that the Commission set a filing deadline one year from the issuance of the final Clean Power Plan rule. SWEEP believes that this proposal would strike an appropriate and effective balance between the issues raised by Commissioner Little and the concerns outlined in this letter.

SWEEP may be able to support a three-year planning cycle for the IRPs but only after improvements to the IRP process have been implemented and have demonstrated their effectiveness.

Given the many concerns raised by Commissioners and stakeholders about the current IRP process, SWEEP has concerns about moving from a two-year to a three-year IRP planning cycle before improvements to the IRP process have been implemented, assessed, and demonstrated to be effective. In addition, SWEEP is concerned that a three-year planning cycle may not accommodate emerging technologies and changes to the utility business model, both of which tend to be happening more quickly than every three years.

Thank you for the opportunity to submit these comments.

Respectfully submitted this 2nd day of July 2015 by:

Jeff Schlegel & Ellen Zuckerman
Southwest Energy Efficiency Project

ORIGINAL and thirteen (13) copies filed this 2nd day of July 2015, with:

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